

USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Greenwood School District **Agency Code:** 10-2394

School(s) Reviewed: Greenwood High School (Grades 7-12)

Review Date(s): 12/13-15/2016

Date of Exit Conference: 12/15/16

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews (AR) are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.

Appreciation/Commendations/Noteworthy Initiatives:

Special thanks is extended to the following staff positions at the Greenwood School District: Administrative Assistant, Food Service Manager, and the Business Manager for the courtesies extended to us during the on-site review. We were especially appreciative of all the time spent answering questions off site and pulling records needed for the on-site review. Each of you were very receptive to recommendations and guidance. The Administrative Assistant did a very thorough job of answering the many questions on the USDA *Off-Site Assessment Tool*, and the answers were easily validated during the on-site review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

- Good documentation of contacts was made with the household when reviewing free and reduced price meal applications, especially when questions arose, and also for keeping a copy of the eligibility notification letter sent to the family.
- Nice that the district had a second review of the meal applications. We encourage this since it can help to ensure all applications are approved correctly and in a timely manner. Good job!
- Good efforts to document follow up with household's reporting *annual income* versus current income. Only those households with fluctuating income, e.g. seasonal workers or self-employed should report annual income. All others persons report *current income*, i.e. weekly, bi-weekly, monthly, etc.

Comments/Technical Assistance/Compliance Reminders

Certification and Benefit Issuance

- As a point of clarification an eligibility determination must be made, the family notified of its status, and the status implemented within *10 operating days* of the receipt of the application.
- Please be sure to at least spot check when importing a direct certification file into the software that the upload properly occurred and all students are receiving the correct benefits. There clearly was an import error made for the 8/29/16 direct certification run for those students that were not certified on the 8/11/16 dc run. The 8/29 file did not correctly upload to the software. Fortunately for those students all were still either in a carryover of benefits from the prior school year, or the household submitted a new paper meal application, therefore no claiming errors occurred. Take more care in the future when uploading files.
- Be sure to keep the *State* direct certification files electronically (file should be backed up) or hard copies of all direct certification runs. This is part of the record retention for the nutrition programs (three years plus the current year or longer if still under audit).
- We discussed *extension of benefits* during the review. NOTE: The DPI template direct certification (dc) notification letter has a box for entering all students linked with the student directly certified. Hopefully the food service software is linked or tied to the district's student database where your Administrative Assistant would be able to see all members living in the same household or at the same address and can put all students living in the household on the notification letter. If not, then by default it will be up to the household (as stated at the bottom of the direct certification notification letter) to let the district know when there are other students residing in the household. Benefits in this case are not retroactive for these additional students.
- Reminder: Any students that were *denied* benefits must be notified in writing, email or mail is fine. Be sure to keep copies of the household notification.

Findings and Corrective Action Needed

Finding: There was one benefit issuance error related to the review of the meal applications. The error is summarized on the SFA-1 review form. Copy attached. The application was coded A1, A2,

and A3. One of the students was directly certified on 8/1, but a meal application submission by the household on October 5 incorrectly changed the status to reduced price meals.

Corrective Action Needed: Under what is called *duration* once a student is eligible for meal benefits the benefit is in effect for the whole school year and for up to 30 operating days into the next school year. In this case since the student (free status was also extended to two other students living in the household) was directly certified, the status should have remained for the entire school year even though the application showed a lower benefit. During the review a contact was made with the software company and apparently there was a software update to rectify this problem which the district did not complete or was unaware of.

For corrective action please write that you have completed the software update to prevent this type of error from occurring in the future, and/or will do a better job when updating eligibility status during the school year to cross check the current certification against the new certification and that no change is made when benefits are reduced (except if occurring as a result of the *verification efforts*). Also indicate your understanding of the *duration regulation*. During the review (December 13, 2016) the error was corrected in the software system to show the eligibility status was changed back to free.

Fiscal action is determined for all *critical review* areas which pertains to certification AND benefit issuance errors. USDA has established a \$600 forgiveness before fiscal action is assessed. The results of the fiscal action will be indicated in the review closure report.

Verification

Comments/Technical Assistance/Compliance Reminders

Since the Verification Collection Report (VCR) had not been submitted the VCR was checked for the SY 2015-16. When validating the VCR the following items were noted:

- Verification process was started after November 15 which is the due date for completion of the process.
- The *We Must Check Your Application* letter was the wrong template and asked the household to report *social security numbers* for all adult household members. This has not been required for several years. Recommend district use DPI template verification letters, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-must-check-1617.docx>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-have-checked-1617.docx>.
- Copies of the *notification letter* was not maintained for the SY 2015-16. All documentation for the households selected for verification was however attached to the applications for the SY 2016-17, including the *Tracker form*.
- Be sure to document all **required follow-up** attempts made with households that do not provide requested income/Food Share documentation, on the *Tracker form*. The follow up occurred last year, it just was not documented on the *Tracker form*.
- For last school year when the household that did not respond to verification which resulted in a reduction of meal benefits, there was no documentation on file to show that the household had been given the opportunity to appeal the change in benefits. The required timeframe is 10 calendar days to appeal a reduction in benefits. The students continue to retain their original

meal benefit for this timeframe, then the software is updated to reflect the new status. For the 2016-17 SY, this review finding was not applicable.

For the SY 2016-17 verification process the following comments are made:

- District correctly used the Standard Sample method. The correct verification notification letters were used. The process was started a little late, not until 11/8 but still completed by the due date. The household was only given until 11/15 (due date for verification) to respond. The *We Have Checked Your Application* letter was not sent out until November 18. Recommend sample selection occur the first week in October, thus giving household adequate time to respond to the verification request, and as needed time for the district to make the required follow-up attempt. To restate: the verification process must be completed by November 15, and the VCR completed by February 1.
- The required *confirmation review* was completed, but not by the correct person. Per the approved online contract the Business Manager is the designated Confirming Official, not the Food Service Manager. Since the Food Service Manager is the person that completes the second review of the meal applications prior to official approval this person cannot complete the confirmation review since this individual should be someone that has not been involved in the original eligibility determination. The Administrative Assistant understood this and agreed to comply when verification is completed for the SY 2017-18. No corrective action was requested.

Meal Counting and Claiming

Findings and Corrective Action Needed

Finding: Review of the meal count information for the review period, October 2016 found some small claiming errors. The district used the report from the software – *District Monthly Participation Data Report*, instead of the individual school *Accuclaim* reports.

Corrective Action Needed: All School Food Authorities (SFAs) are required to complete a monthly *edit check*. The edit check compares daily meal counts against eligible free, reduced and paid times an attendance factor to ensure more meals are not claimed than allowed. For your software the edit check report is called *Accuclaim*.

For corrective action we discussed having the district look at a *detail* count report to see if there is a student that is possibly coded to the wrong eligibility category or an incorrect entity. **All reports** within a software should match, so if the reason for the error cannot be determined then at the time future reimbursement claims are prepared the Business Manager should only use the *Accuclaim* reports.

We also discussed that since the district has a monthly enrollment and attendance report the *actual enrollment/attendance* for each building should be entered for determining the attendance factor instead of the using the third Friday count in September thru December, and updated per third Friday counts in January thru June. We also discussed that for the food service reports it is not necessary to separate meal counts for the middle and high school since the district reports the MS/HS as one

building on the meal programs online contract – Schedule A. This would mean there is a need for only the 400 entity, and not a 300 and a 400 entity within the software. Please consider this.

For corrective action please provide written detail if you were able to determine the cause of the report discrepancies for October. If not, then detail your understanding that for all future reimbursement claims the Accuclaim reports will be used. Also submit a copy of the November and December software meal count reports, Accuclaim reports and enrollment/attendance reports used for each reporting period.

Since meal counting is considered a *critical review* area it is subject to fiscal action for the incorrect claiming periods. USDA has established a \$600 forgiveness before fiscal action is assessed. The district will be advised in the review closure report if fiscal action will be required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations

Thank you to the food service director for sending in detailed, organized meal pattern documentation prior to the on-site review and for answering many questions via email. All the food service staff at Greenwood High School are doing a fantastic job of serving healthy meals to students each day. Thank you for being so welcoming, for answering our many questions, and for being receptive to our feedback and suggestions.

Comments/Technical Assistance/Compliance Reminders

- **Portion Sizes:** Keep an eye on portion sizes of self-serve items that are not needed to credit towards the meal pattern, such as shredded cheese on the salad bar. During lunch observation it was noted that many high schoolers took very large amounts of cheese. Since the cheese was not needed to credit towards the meat/meat alternate component on this menu day, it only added calories, sodium, and saturated fat. Technical assistance was given on using small portion cups to pre-portion cheese and posting a sign to tell students that they may only take one portion cup of cheese. Another option is to use a small spoodle/spoon instead of tongs, and posting a sign to tell students they may only take one spoonful of cheese. This is something that will need to be enforced by the staff (cashiers) at the end of the line, as it will be an adjustment for students.
- **Salt:** There are small packets of salt available at the condiment station. It is strongly discouraged to offer salt to students, as the sodium limits are set so that there is not much room for additional sodium to be added after the rest of the meal is taken into account. Greenwood High School already has a selection of sodium-free spices available to students, and this is a great alternative to salt. During the on-site review the food service director agreed to remove salt from the condiment station, and said that it would be an easy fix as not many students take it.
- **Serving Sizes for Fruits/Vegetables:** During lunch observation it was noticed that the spoodles used for serving the cooked carrots and applesauce did not match the planned portion size listed on the production records. There were many other fruit and vegetable offerings, so students were still offered their required amount of fruits and vegetables. However, it is very important that the portion utensils used match what is listed on the production records. The menu planned is planning these portion sizes to meet specific daily and weekly requirements. Technical assistance

was given on retraining staff on the importance of following the planned portion sizes, as well as a reminder on the fact that, for example, a “3 oz.” spoodle measures 3/8 cup. The School Nutrition Team has a helpful webcast on portion control that can be found here: <http://dpi.wi.gov/school-nutrition/training/webcasts#pc>.

- **Crediting Documentation:** As a reminder, a Child Nutrition (CN) label or product formulation statement (PFS) is required for any combination food or meat/meat alternate or other processed food not found in the USDA *Food Buying Guide* for Child Nutrition Programs. Please keep updated copies of CN labels on file. It is important that CN labels are taken directly from the box. They can be kept in original format or photocopied as a clear, legible photocopy with the entire label visible. When CN labels are not available for products, those products must have a current, accurate PFS detailing product composition and crediting information in order to be served in Child Nutrition Programs. More information regarding crediting documentation can be found at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/meal-pattern>.
- **Grain Crediting:** Exhibit A in the Food Buying Guide is a helpful tool for crediting grain items. It can be found here: http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exa_fbg.pdf. Our webcast on the grain component provides an example of how to credit using Exhibit A: <http://dpi.wi.gov/school-nutrition/training/webcasts#grains>.
- **Training:** Regular trainings are offered on the Wisconsin DPI webpage through webcasts, webinars, and on-site trainings. Please stay tuned on our webpage for current and upcoming opportunities <http://dpi.wi.gov/school-nutrition/training>. Please also know that all members on the School Nutrition Team are available for technical assistance any time throughout the year. A current staff directory can be found on our website: <http://dpi.wi.gov/school-nutrition/directory>.

Findings and Corrective Action Needed

- ❑ **Finding #1:** Upon review of documentation for the week of review (October 3-7, 2016), it was found that some of the grain items served were not whole grain-rich. In order to credit towards meal pattern requirements, grain items must be whole grain-rich, which means that the first grain ingredient listed on their label is a whole grain. Some examples of whole grain ingredients include whole wheat, whole corn, or whole oats.

Corrective Action Needed: Please submit the nutrition facts labels and ingredient information for the tortilla/wrap and dinner roll.

- **No further action needed; labels sent in prior to on-site review. Thank you!**

- ❑ **Finding #2:** Some of the recipes on file do not contain all the necessary parts of a standardized recipe. Information on recipe standardization and requirements is found here: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>. A few recipes were discussed with the food service director prior to the on-site review, and multiple revisions of recipes were sent back and forth. Technical assistance was given during the on-site review and we went through the chicken Alfredo recipe in detail to determine crediting. We discussed that while a recipe may credit a certain way on paper, you cannot know the true yield and number of portions of a recipe until you make it. A standardized recipe is one that has been tried, tested, adjusted, and retested as necessary.

Corrective Action Needed: The next time you prepare the chicken alfredo recipe, please check the standardized recipe to see if any of the information needs to be adjusted (for example, the portion size or number of servings). Adjust the written recipe as needed to reflect these changes. Then please submit this final recipe.

- ❑ **Finding #3:** Some portions of production records are not being consistently filled in. For example, the leftover column is not being filled in at breakfast, but the number of items used is being recorded in the “total planned quantity” column, which is not the correct place for that information. Additionally, the total number of meals planned and served (daily meal counts from the software) must be recorded at the top of the production records for both breakfast and lunch. On the salad bar production record, the planned portion size of each item must be filled in. Generally, it is realistic to set a planned portion size of 1/8 cup of each fresh vegetable offered, with the possible exception of leafy green vegetables. More information on production records, including templates and requirements, is found here: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>.

Corrective Action Needed: Please submit one week of completed production records for both breakfast and lunch, including salad bar production records. Make sure that all information is filled in.

- ❑ **Finding #4:** Food service staff at Greenwood High School are unsure of Offer versus Serve (OVS) requirements, specifically regarding the amount of fruit and/or vegetable that must be on a student’s tray in order to have a reimbursable meal. To have a reimbursable lunch, students at all grade levels must take three components, including ½ cup fruit and/or vegetable. Technical assistance was given on-site and OVS resources will be emailed to the food service director. We discussed using the OVS webcast which is found here: <http://dpi.wi.gov/school-nutrition/training/webcasts#ovs>.

Corrective Action Needed: Please submit specific information on how you retrained staff on OVS requirements. Please include when the training took place, what you used to train staff, and a staff sign-in sheet.

3. RESOURCE MANAGEMENT

Comments/Technical Assistance/Compliance Reminders

- REMINDER: SFAs are required to have a *local meal charge policy* in place no later than July 1, 2017. More information, resources and best practices may be found on the School Nutrition Team <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>, scroll down to the unpaid meal charges section. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
 - Best Practices
 - Local meal charge policy checklist
 - Sample outstanding balance letter
 - Sample robo-call script

The district has what appears to be a meal charge policy, at least there was some very good language

in the district's back to school newsletter regarding meal accounts and uncollected balances. Please compare your policy to the policy requirements outlined in the above Unpaid Meal Charge Guidance and the USDA memo - SP-58. As needed, revise and submit for school board approval prior to July 1, 2017. In terms of the section on REFUNDS, please note that the policy requires refunds to students that receive *Reduced Price* meal benefits when the student withdraws or leaves the district. Refer to page 32 of the Unpaid Meal Charge Guidance above.

USDA has established four areas for compliance in the *Resource Management* area. A series of questions related to: Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, and Indirect Costs was sent to the SFA at least 4 weeks prior to the AR. Based on the answers the district triggered for what is called a *Comprehensive Review*. For the district a comprehensive review was conducted only in the *Revenue from Nonprogram Foods* area. *This area of the Administrative Review **has not** been completed as some additional questions were sent on December 20 to the Business Manager and the Food Service Manager. **Due date for the responses is on or before January 13, 2017.***

The subsequent sections in this section of the report will provide technical assistance and as needed corrective action for three of the areas.

Nonprofit School Food Service Account

Annual Financial Report:

All revenues including reimbursements, student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong, and this will aid the school in calculating its "yearly" reference period for nonprogram food compliance which is highly recommended. The new 16-17 Annual Financial Report (AFR) instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>.

An amendment was made to the SY 2015-16 AFR prior to the onsite AR since the report did not match the district's audited report sent to DPI. The amendment was needed to include revenues and expenditures for the WI School Day Milk Program and the Summer Food Service Program. When that was completed the Child Nutrition Program Report matched the DPI report. Please be sure to carefully review the financial report instructions and/or review the webcast, <http://dpi.wi.gov/school-nutrition/training/webcasts#afr> on the new financial report since there are significant changes to this report effective with the SY 2016-17.

Paid Lunch Equity

Findings and Corrective Action Needed

Finding: The district correctly completed the Paid Lunch Equity (PLE) Tool for the SY 2106-17 as this is an annual requirement. The PLE tool required a minimum of a \$.05 paid lunch increase for this school year. During the on-site AR it was found that an inadvertent error had been made, and the software had not been updated to reflect the required \$.05 paid lunch price increase.

Corrective Action Needed: It was agreed meal prices would be compliant and/or updated effective January 3, 2017. Please provide a corrective action statement of compliance and submit a print screen to show the update has been made. Please take more care to double check price increases are made in the future.

We also request that the online contract be updated to reflect the *correct* the breakfast meal price of \$1.50. Also correct the adult breakfast meal price to reflect the correct amount being charged, \$1.90. Also correct the phone extension for the Food Service Manager, should be 5527. Reminder: The online contract can and should be updated anytime a change is made.

Revenue from Nonprogram Foods

The Healthy Hunger Free Kids Act of 2010 established requirements regarding revenue from the sale of nonprogram (NP) foods (formerly referred to as *ala carte*). All revenue from the sale of NP foods must accrue to the nonprofit food service account, and revenue available to support the production of reimbursable school meals does not subsidize the sale of nonprogram foods.

Nonprogram foods include any nonreimbursable foods and beverages purchased using funds from the nonprofit school food service account, such as adult meals, food sold outside of school hours, or any food used for catering or vending activities. For the Greenwood School District this includes adult meals, catering (for example, back to school inservice breakfast for staff), vending-Head Start Meals, ala carte-breakfast items, second lunch entrees, extra milk including milk break milk offered to non-needy students at no charge, and fundraisers (chili fundraiser).

The district was able to show that adult meal costs are being covered for those adult meals provided to staff at *no charge* as part of a contractual agreement. All other adults and non-program persons pay for their meals at the established price which is consistent with the Adult Meal Pricing Guide, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. General fund transfers/journal entries were also provided and showed the district was covering the cost of these meals.

Be reminded that revenue and expense for all nonreimbursable adult meals will be reported on the *NEW* Food Service Program financial report (referred to above under Nonprofit School Food Service Account) as a nonprogram food and revenue. Schools no longer report the number of nonreimbursable meals on the monthly reimbursement claim.

Compliance for all nonprogram food/beverages is determined if the percent of total revenue generated from nonprogram food sales is equal to or greater than the percent of total food costs for nonprogram foods. USDA allows schools to use a simplified approach to determine compliance, by selecting a reference period (5 consecutive days). SFAs will separate nonprogram food costs from their program food costs for the 5 day reference period. DPI has created a tool to assist schools in meeting this requirement, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>. The DPI tool can also assist SFAs in pricing nonprogram foods and calculating total nonprogram food expenses and revenues and total program expenses and revenues for the designated reference period. This data then pulls into the USDA *Nonprogram Food Revenue Tool* comparing revenue and food cost ratios to measure compliance.

Finding: As part of the comprehensive review the district is required to complete either the DPI or USDA Nonprogram Food Revenue tool. This was not completed prior to or during the review since some additional work needs to be done to cost some of the recipes/menu items sold. The tool was discussed during the onsite review with the Business Manager and the Food Service Manager.

Corrective Action Needed: As corrective action it was agreed that the tool would be completed and submitted to DPI for a selected reference period this school year. Please be sure to include ALL ala carte foods/beverages sold (breakfast and lunch), adult or nonreimbursable meals, Head Start meals, and any catering functions that occurred during the reference period. If the food cost ratio is higher than the revenue ratio, the SFA must take steps to increase the revenue from nonprogram foods by either increasing food prices for nonprogram foods or contributing non-federal funds to the food service account. If this is necessary provide written detail of your plan to comply with the pricing requirements. We are happy to assist the district in the completion of the tool, but encourage the use of the DPI tool since our tool can help the school in determining which product prices could be increased and by how much to increase the revenue ratio to be in compliance.

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations

Excellent efforts by the district to utilize the county social service agency to publicize availability of the free and reduced price meals at the Greenwood School District.

Comments/Technical Assistance/Compliance Reminders:

Special Dietary Needs

The district is in the process of completing a review of all school board approved policies.

Policy 8500-Food Services contained some language regarding meals/substitutions provided for students with disabilities. Some of the language is not consistent with recent changes in the Americans with Disabilities Act (ADA) and how it affects the school nutrition programs.

Until recently regulations only *required* schools to make meal accommodations if a licensed medical professional provided documentation to establish that the student has a *disability*. Recent passage of the ADA Amendments Act, considers most physical and mental impairments to constitute a disability. So rather than focus on whether or not the student has a disability, schools should now focus on ensuring equal opportunity to participate in the meal programs. Refer to this USDA policy memo, <http://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>.

If accommodations are made without out medical statement, the student must be offered all meal pattern components and select at least three (this includes selection of at least ½ cup fruit or vegetable) per your offer versus serve policy.

DPI will be updating the *Dietary Request* form soon to meet modified requirements regarding accommodations for students with special dietary needs. Since medical authorities no longer need to

check a box to indicate if the child's medical condition is a "disability" the form will still require the medical authority to indicate the following: types of foods to be avoided, a list of foods to be substituted; and require a description of the modifications needed to accommodate the child's needs. If the form is completed by a medical authority the school will be required to meet the student's dietary needs/meal accommodations. When the new form is provided to the schools, please replace the form that is currently posted to your website.

It is recommended that the district compare your policy to the USDA guidance and update the language in the policy referenced above to be consistent with these changes.

Public Release

Please delete reference to the Special Milk Program when sending out the media/Public Release in the future as the district does not offer this Federal Milk Program.

On-site Monitoring

Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the **readily observable general areas** of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/nslp-onsite-monitoring.doc>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sbp-onsite-monitoring.doc> for the breakfast program.

For the SY 2016-17 the Food Service Manager completed the on-site reviews, but it appeared that the reviews were done almost monthly. It is an option to complete these reviews more frequently but as noted above, the minimum requirement is one review by February 1 each school year. We discussed the intent of the monitoring form including the scope of the questions.

A recommendation was made for the Administrative Assistant, Food Service Manager, and possibly the Business Manager to review the questions and possibly share the responsibility for completion of the monitoring reviews since the questions focus on some of each person's areas of responsibility.

Local Wellness Policy Summary for Administrative Review

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness

policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

A summary of the requirements can be found at:

http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

The district wellness policy was recently updated using a Neola template. DPI has created a Local Wellness Policy Checklist which was used to compare the district policy against the WP regulation/requirements. Please see attached and consider these recommendations for additional update of the district policy before July 1, 2017.

Smart Snacks in Schools

Commendations

Thank you to the staff at Greenwood High School for doing a great job of keeping organized documentation on fundraisers. Having a system already in place to keep track of fundraisers will make compliance with Smart Snacks much easier.

Comments/Technical Assistance/Compliance Reminders:

Smart Snacks in Schools

- All foods or beverages sold to students on the school campus between midnight and 30 minutes after the end of the instructional day must be in compliance with the Smart Snacks rule that went into effect on July 1, 2014. Information on this regulation, along with a product calculator to help

determine compliance of various food items, can be found on our website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

- Each student organization may hold two exempt fundraisers per school year. An exempt fundraiser can sell foods or beverages that do not meet the Smart Snacks guidelines. Each fundraiser cannot exceed two consecutive weeks in length, and it cannot occur in the meal service area during meal time. Technical assistance was given on upcoming exempt fundraisers that will occur during the school day but not in the meal service area. We discussed using the tracking tools (found on our website at the link above) to document these exempt fundraisers. Greenwood High School must keep documentation of these exempt fundraisers to show that they are compliant with the regulations. The school must complete the exempt fundraiser tracking tool annually and use it to ensure that each student organization does not hold more than two exempt fundraisers.

Findings and Corrective Action Needed

- ❑ **Finding #1:** A vending machine that is on during the school day sells zero-calorie flavored water, which is not allowed at the middle school level. Since Greenwood High School is a 7-12 school, the beverages sold must meet the requirements for the youngest grade group. For the middle school level, the only allowable beverages under Smart Snacks are milk, 100% juice, and plain water. There are serving size limits on each of the allowable beverages. Please see our “Smart Snacks in a Nutshell” handout for more information:
<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/smart-snacks-in-a-nutshell.pdf>.

Corrective Action Needed: Please submit a written statement explaining the changes you will make to ensure that the beverages sold in this vending machine are compliant with Smart Snacks.

- ❑ **Finding #2:** Greenwood High School sometimes sells seconds of side dishes that do not have an exemption under the Smart Snacks rule, such as breadsticks, whole grain-rich chips, or pasta salad. These items need to be compliant with the Smart Snacks general and nutritional guidelines in order to be sold a la carte. Technical assistance was given on using the Smart Snacks calculator to analyze products, and the possibility of reducing serving sizes to make products compliant if necessary. If any side dishes served as part of the reimbursable meal do not meet Smart Snacks guidelines (for example, a cookie that is not whole grain-rich), they will not be able to be sold a la carte. We also discussed the option of simply eliminating the option of purchasing seconds of some items, such as desserts. It will also be necessary to add buttons on the POS system so that sides can be charged individually. Finally, we discussed using the Smart Snacks Tracking Tool (found on our website) or a similar tool to keep track of the items that food service sells a la carte that do not have exemptions. Food service must keep the completed tool on file, as well as the nutrition facts information or recipes for the items sold, and the calculator printout if applicable.

You will also want to remove the *second meal* button since second full meals can no longer be sold because the *unit meal* would not be Smart Snacks compliant. It was recommended that communications be sent out to households clarifying that moving forward only second entrees and Smart Snacks compliant sides would be sold.

Corrective Action Needed: Please submit a written statement explaining your plan for checking the compliance of all sides/seconds that are sold a la carte. Please also submit information on how students will be charged for these items and who will be in charge of tracking compliance.

Professional Standards

The Healthy Hunger-Free Kids Act of 2010 amended 7 CFR Parts 210 and 235 of the regulations to institute hiring standards for the selection of State and local school nutrition program directors and requires all personnel in the school nutrition programs to complete annual continuing education/training. These regulations are expected to result in consistent, national professional standards that strengthen the ability of school nutrition professionals and staff to perform their duties effectively and efficiently. These regulations took effect July 1, 2015.

Commendations

The food service manager has done an excellent job of meeting the above professional standards requirements (for the SY 2015-16 and SY 2016-17) for herself and all food service staff in the district. She has documented training efforts and has maintained a file of all training attended. Great job!

Comments/Technical Assistance/Compliance Reminders

#1- Due to the scope of the food service program duties the Administrative Assistant, Cashiers, and the Business Manager also need to complete Professional Standards requirements in the category of *Non-School Nutrition Program Staff with Job Duties Pertaining to School Nutrition Programs*, and need to obtain continuing education hours (and document on the tracking tool) each school year. Refer to the DPI, Professional Standards Nutshell, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-in-a-nutshell.pdf>, and <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/professional-standards-training-requirements.pdf>.

Each of these staff can document their own training using the Food Service Manager's Tracking tool and at the end of year the Food Service Manager can add tabs for these positions to her tool to show Professional Standards completed for *all district staff* for a particular school year. In terms of available trainings, please refer to the training website, for webcasts, and upcoming DPI trainings, <http://dpi.wi.gov/school-nutrition/training>.

#2- Reminder to the Food Service Manager to be sure to keep the Tracking Tool current for each school year. The SY 2016-17 is the end of the two-year cycle for Professional Standards, and next year will be the start of a new 2-year cycle to obtain the required continuing education hours for at least the food service staff. Consider this year 1 for the non-food service program staff.

Food Safety, Storage and Buy American

Commendations

The kitchen and food storage areas at the high school (store room, refrigerator/freezer, and milk cooler) were well maintained and clean. Really nice efforts by the food service staff to clean the salad

bar unit and wash tables between serving periods. The serving areas looked just as nice at the end of the meal service as they did at the start of the meal service. Students did a good job of serving themselves and used tongs and portion control utensils.

Food Safety Inspections

Every school operating USDA School Child Nutrition Programs, must have two food safety inspections during each school year, one in the fall of the school year, which is an actual Food Safety Inspection, and one in the spring which is a review of the site's Food Safety Plan. Food safety inspection reports need to be posted in public view. The most recent inspection report was publicly posted as required. The food service manager also had a complete food safety plan.

Comments/Technical Assistance/Compliance Reminders:

As noted above the food safety area is monitored by the local health inspector twice per year. We recommend that you discuss the following comments and corrective action with your inspector at the time of the next inspection.

- The steam table was used to heat vegetables. Steam tables should not be used to heat or reheat food. Hot-holding equipment does not pass food through the temperature danger zone (41°F to 135°F for vegetables) quickly enough. Food must be heated or reheated correctly (steamer, stovetop, etc.) then moved to a hot-holding unit.
- Take more care when operating the dish machine to change gloves more often particularly when there is only one person operating the dish machine. This will minimize the potential for cross contamination when moving from the soiled end of the dish machine to the clean end for unloading dishes and utensils.

Buy American

Comments/Technical Assistance/Compliance Reminders:

Regulations took effect with the start of the 2016-17 SY for the *Buy American provision*. This provision requires SFAs to purchase, to the maximum extent practicable, *domestic agricultural commodities or commercial food products*. "Domestic Commodity or Product" are defined as an agricultural commodity that is produced in the United States and a food product that is processed in the United States using substantial agricultural commodities that are produced in the United States. "Substantial" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as territories of the United States.

The Buy American provision (7 CFR Part 210.21(d)) is one of the procurement standards SFAs must comply with when purchasing commercial food products served in the school meals programs. The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

The AR requires the State Agency to assess compliance by checking 1-2 items in a variety of food categories.

The following items were found to be non-compliant:

Olives-Product of Spain
Canned Fruit Cocktail-Africa
Kiwi-Italy

Recommendations for compliance:

Some products will not be grown domestically, such as pineapple and mandarin oranges. The food service manager should work with distributors to see if these products are available domestically. If they are not, document this on the Non-compliant Product List, <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx>. Note: The use of this form is the exception, not the rule. I encourage the Food Service Manager to read what is posted about Buy American on the website, <http://dpi.wi.gov/school-nutrition/procurement/buy-american>. You might also read thru the USDA memo, SP24-2016, <http://www.fns.usda.gov/sites/default/files/cn/SP24-2016os.pdf>. If there are additional questions about Buy American the food service manager should ask them during the upcoming procurement review.

School Breakfast Program (SBP) and Summer Food Service Program Outreach (SFSP)

Comments/Technical Assistance/Compliance Reminders

- At the beginning of the school year, the SFA must notify families of the availability of breakfast and send reminders regarding the availability of breakfast multiple times throughout the school year. The district back to school newsletter has a nice section on the food service program and the benefits of school lunch and the commitment to providing healthy meals. Please expand on this a bit more to discuss the importance of getting a good start to the day by participating in the school breakfast program.
- The district is a participant in the Summer Food Service Program and is required to inform families about the availability of the program. We discussed sending promotional information (dates of operation, times, and locations of the SFSP) to the county social service agency and the private school in your town.

5. OTHER FEDERAL PROGRAMS REVIEWS

Wisconsin School Day Milk Program (WSDMP)

Findings and Corrective Action Needed

Finding:

The Wisconsin School Day Milk Program milk count information used in the SY 2015-16 reimbursement claim (completed annually) found that milk had been claimed for grade 6 and for students receiving milk that are non-needy or in the paid category.

Corrective Action Needed: The WSDMP is a State funded milk program that provides schools with reimbursement for milk break milk served to PK-5 students eligible for free and reduced price meals. The school is not reimbursed for non-needy or 6th grade milk. Since the reimbursement for the SY 2015-16 has not yet been calculated, we request that the district amend the reimbursement claim taking out paid and 6th grade milk. Submit copies of the milk documents and software data to show the adjustments.

Additionally, since this problem has occurred for many years, the department is requesting claim adjustments (these will be done manually, and required submission of milk count records showing how the adjustments were calculated) for the previous four (five total school years with the SY 2015-16) school years, 2011/12-2014-15. DPI will calculate the overpayment to the district and require repayment for these school years.

The problem appears to have occurred due to the software set up. Please detail in your corrective action response how you have corrected the problem and your understanding regarding correct claiming procedures for this milk program for this school year. The problem of claiming the 6th grade should not continue to occur since it was the reviewers understanding that this school year only PK-4 is participating in the milk break/program.

With regard to the milk served at no charge to non-needy students, milk served at break time is ala carte and is considered a nonprogram food/beverage. Since it is a district or local decision to provide free milk, the food service program must be reimbursed for the cost of the milk at the end of the school year, even if the food service account has a positive fund balance. As part of the corrective action for this review finding, please acknowledge your intent to comply with this requirement.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.



With School Nutrition Programs!